IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WILLIAM STANFORD, JR., Individually and on Behalf of All Other Similarly Situated Persons and on Behalf of the Foamex L.P. Savings Plan,

Plaintiff,

v.

FOAMEX L.P., FIDELITY MANAGEMENT TRUST CO., K. DOUGLAS RALPH, STEPHEN DRAP, GREGORY J. CHRISTIAN, and GEORGE L. KARPINSKI,

Defendants.

No. 07-CV-04225

William H. Yohn, Jr.

PLAINTIFF STANFORD'S MOTION FOR FINAL APPROVAL OF SETTLEMENT AGREEMENT UNDER FRCP 23(e)

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiff William Stanford, on his own behalf and on behalf of the class he represents, moves for an Order that approves the proposed Settlement Agreement and Allocation Plan under FRCP 23(e).

This motion is supported by a memorandum in support, Declaration of Richard E. Spoonemore Re: Final Approval, Declaration of Charles F. Seemann III Regarding Compliance with the Class Action Fairness Act, and Declaration of Rosemary J. Bruno Regarding Compliance with the Class Action Fairness Act.

DATED: July 13, 2012.

SIRIANNI YOUTZ SPOONEMORE

BY: <u>/s/ Richard E. Spoonemore</u>
Richard E. Spoonemore (WSBA #21833)
Admitted Pro Hac Vice

PLAINTIFF STANFORD'S MOTION FOR FINAL APPROVAL OF PROPOSED SETTLEMENT AGREEMENT [Case No. 2:07-cv-04225-WY] 999 Third Ave., Suite 3650 Seattle, WA 98104 Tel. (206) 223-0303; Fax (206) 223-0246 rspoonemore@sylaw.com

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Counsel for Plaintiff William Stanford, Jr.

CERTIFICATE OF SERVICE

I certify, under penalty of perjury, that on July 13, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and that a true and correct copy of the foregoing was served upon the following by ECF:

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DATED: July 13, 2012.

BY: /s/ Richard E. Spoonemore
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PLAINTIFF STANFORD'S MOTION FOR FINAL APPROVAL OF PROPOSED SETTLEMENT AGREEMENT [Case No. 2:07-cv-04225-WY]